

Attachment I

Declaration of Latoya Strickland

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Pursuant to 28 U.S.C. § 1746

I, Latoya Strickland, hereby declare and state as follows:

1. I am a U.S. Citizen over the age of eighteen and reside in Newnan, Georgia.

2. I have personal knowledge of the following facts, to which I could and would testify to if I were called to testify as a witness.

3. On or about March 2021, I bought a car from U.S. Auto with a loan from U.S. Auto. I am a single mom and I rely on dependable transportation for work and to take care of my kids.

4. I made my car payments on time each month to USASF Servicing, my loan servicer. During the more than two years I had this car, I never missed a payment. There were times when I made payments ahead of time when I had extra money. I learned early on in my car loan that the best way to pay USASF was through the mobile app using my debit card. If I paid using MoneyGram or through the mail, the payment might take a few days to be processed. It's also possible to pay over the phone, but the U.S. Auto customer service is hard to get ahold of and I don't have time to wait on hold for long stretches of time.

5. One morning in the fall of 2021, I got into my car to go to work at around 7am and my car did not start. The car was beeping and I didn't know what was happening. I did not know that when I bought my car from U.S. Auto that they had installed a kill-switch. Because my car wouldn't start, I had to miss work, losing around \$170 in wages. Though I was only two hours late to work, they had already filled my slot so I lost my day's income. I also had to pay \$20 to my neighbor to take my kids to school.

6. I immediately called USASF to find out if they were the reason my car was disabled. I called several times and it took me approximately two hours to reach a USASF representative. I kept calling but the customer service phone number wasn't being answered. Finally, around 9am, a USASF representative answered my call. USASF told me that they had no record of my payment. I told the USASF representative that I had received a tax refund, which I had used to pay that month's car payment plus an extra month's car payment just a couple weeks earlier. The USASF representative told me that I had to tell them when I make an extra payment because it doesn't

1 always show up in their system. The USASF representative gave me the instructions for turning my
2 car back on. Within five minutes, my car was working again.

3 7. On or about May 2022, I got into my car at around 11am and, once again, my car
4 made a beeping noise. I immediately understood that this noise meant that U.S. Auto had disabled
5 my car. I called USASF and the representative told me that my car payment was past due. That was
6 not true. My car payment was due that day. I told the USASF representative that my payment was
7 due that day, and that I was planning on making my payment that day. The representative told me
8 that he would not turn on my car unless I made a payment over the phone with him because I was
9 already past a five-day grace period. I told the USASF representative that he was wrong, that my
10 payment was due that day and that I understood that I had until midnight to make my payment. I
11 told the USASF representative that I needed to use my car to drive to the bank to deposit my
12 paycheck in order to make the payment in the app on my debit card. The USASF representative
13 agreed to give me a one-time exception and told me that he would turn my car off again in 24 hours.
14 Shortly afterwards, my car started up again and I was able to deposit my paycheck and make my
15 USASF payment.

16 8. USASF never gave me compensation for wrongfully shutting down my vehicle twice.
17 Having an unreliable vehicle was stressful as a single parent and I would wake up afraid that I
18 couldn't take my children to childcare if my car wasn't working. I was living in fear that I couldn't
19 trust USASF to process my payments properly and that they would put me in jeopardy of losing my
20 job.

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22 I declare under penalty of perjury that the foregoing is true and correct.

23 Executed on 9 27, 2023.

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Latoya Strickland